

	)	Civil Action No. 13-13300-ADB
CINSIA AND ALFONSO CIOLINO	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
AARON EASTMAN,	)	
DAVID EARLE,	)	
GEORGE GIKAS,	)	
	)	
Defendants.	)	
	)	

The plaintiff hereby respectfully requests that this Honorable Court make the following inquiry of the venire

- IF YES (for individual voir dire):**

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2. Have you had contact with police officers or other law enforcement officers through your work? In your neighborhood? In your social life?
3. Some people think that even though the police make mistakes and arrests the wrong person, that is the price we have to pay for police protection. What is your opinion about that.?
4. Do you think that police receive any kind of special training about how to testify in court?

IF YES:           What kind of training? Why? How do you think that training affects how they present themselves as witnesses?

IF NO:           How often do you think they testify in court? How do you think they prepare themselves to testify?

5. In general, do you think you'd be inclined to give greater weight to the testimony of a police officer than you would to an ordinary citizen, because he is a police officer? IF YES: why is that?
6. Do you have an opinion about which is more important - law and order or preserving everyone's constitutional rights? If so, what is your opinion?
7. Are you willing to enforce the civil rights of Mr. Ciolino as you would any other right he and you are entitled to in this country?
8. This is a lawsuit brought by a private citizen against members of a law enforcement agency. Do you feel that citizens who believe that they have been treated illegally and unfairly have a right to bring suit against police officers?

9. In a civil case the law requires a plaintiff to prove his case by a “preponderance of the evidence.” This is very different than a criminal case, where as perhaps you know, proof is required “beyond a reasonable doubt.” It is easier to prove a civil case than a criminal case. Do you feel you could follow the court’s instructions and find for the plaintiff if he proves his case by “the preponderance of the evidence”?
10. Do you believe that Mr. Ciolino is required to make an additional showing beyond preponderance of the evidence because he is charging a police officer with a violation of his constitutional rights?
11. Would the fact that the plaintiff was arrested in this case interfere with your ability to render a fair and just verdict based on the law?
12. During deliberation, if you have formed an opinion, would you keep an open mind and listen to the opinion of others?
13. Can you accept the proposition that this case must be decided on the basis of evidence presented in this courtroom and nothing else?
14. Have you ever voiced an opinion or made a statement to the effect that too many people sue just to get an easy pay off? Or those civil suits are what drive up insurance premiums? Have you ever heard such a statement made? What is your reaction to hearing this type of statement?
15. What internet sources do you rely upon for news on a daily basis?
16. Have you ever served as a Grand Juror? Briefly describe this experience.
17. Have you, any member of your immediate family, or close personal friend been a defendant in a civil lawsuit?

**IF YES (for individual voir dire):**

1. Would this fact tend to influence your decision in this case in any way?

18. There is an allegation in this case that the plaintiff may have taunted a police dog prior to his arrest. The plaintiff denies this allegation. Would the mere allegation that the plaintiff taunted a dog interfere with your ability to render a fair and just verdict based on the law?

RESPECTFULLY SUBMITTED,  
PLAINTIFF

Dated: January 13, 2015

/s/ Robert S. Sinsheimer  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 13, 2016.

/s/ Robert S. Sinsheimer